UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BRIAN COOLEY and COOLEY & CO. LTD

Plaintiffs,

- against-

PENGUIN GROUP (USA) INC., DK PUBLISHING, INC, an affiliate of PENGUIN GROUP (USA) INC., DORLING KINDERSLEY LIMITED, an affiliate of PENGUIN GROUP (USA) INC., GETTY IMAGES, INC., CORBIS CORPORATION, RGB VENTURES LLC D/B/A SUPERSTOCK and LOUIS PSIHOYOS,

12 CIV 0001 (LAK)

ECF CASE

RULE 7.1 STATEMENT

Defendants.

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Penguin Group (USA) Inc. is a wholly owned subsidiary of Pearson Longman, Inc. Pearson Longman, Inc. is a wholly-owned subsidiary of Pearson, Inc. Pearson, Inc. is owned by Pearson Capital Company LLC (5.59%) and Pearson Luxembourg Holdings Ltd. (94.24%) and their parent, Pearson Overseas Holdings, Ltd. (0.17%). Pearson Overseas Holdings, Ltd. is a wholly owned subsidiary of Pearson plc. Pearson plc shares are publicly traded on the London Stock Exchange, and Pearson plc ADRs trade on the NY Stock Exchange.

Penguin Group (USA) Inc. is 100% owner of the following subsidiaries:

Book Country LLC
Dorling Kindersley, Inc.
Dorling Kindersley Publishing, Inc.
Frederick Warne Co., Inc.
Penguin Highbridge Audio LLC
Penguin Capital LLC

In the United States, DK operates as an unincorporated division of Penguin Group (USA) Inc.

Dated: New York, NY January 12, 2012

s/Richard Dannay

Richard Dannay (rxd@cll.com)

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Attorneys for Defendants Penguin Group (USA)

Inc., DK Publishing Inc., and Dorling Kindersley Limited